

A photograph of two young children, a girl on the left and a boy on the right, sitting in a car seat. They are both smiling and looking towards the camera. The girl has long dark hair and is wearing a blue top. The boy has short dark hair and is wearing a dark long-sleeved shirt. The background is blurred, showing other people in a similar setting. The overall lighting is soft and blue-toned.

Driving forward
on our ESG journey

2021 ESG REPORT

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A Message from our CEO

Steve Thibodeau
CEO



Access to affordable, reliable transportation is essential to everyone in today's busy world. It enables people to get to work, take their children to school and care for needs of their families. Affordable transportation can be a real differentiator in providing people the opportunity to improve their quality of life and financial stability.

Unfortunately, most banks only lend to people with perfect credit, leaving behind tens of millions of people. At Global Lending Services (GLS), we are focused on making transportation more accessible and affordable for customers. Through advanced analytics and technology, we can more accurately predict credit risk, and provide more people with an affordable auto financing option for their next vehicle. We also partner with large pension funds, insurance companies, investors, and banks to make sure we are able to secure the best rates for customers based on their individual credit.

And that's just what we've done for the past 10 years. In fact, we've helped more than 450,000 customers secure the loan they needed to purchase a reliable car. For so many, that car opened the door to new opportunities and helped them manage their everyday life.

We believe that our responsibilities as a corporate citizen are firmly aligned with our mission and our values. By always focusing on our customer first, we also do right by our employees, business partners, capital partners, communities, and other stakeholders. While this has been and always will be a core tenet of our culture at GLS, we recognize that sharing more information about our activities and commitments will create greater transparency and understanding about our work as a business and as a community partner, and the meaningful social impact we strive to achieve.

To that end, I am pleased to share with you our inaugural Environmental Social and Governance (ESG) report. This report marks a major step forward in our company's sustainability journey and highlights our commitment to operating our business with the highest standards of ethics and integrity.

Many of our ESG-related activities and policies have been table stakes for years, from increasing access to affordable credit to building a diverse and inclusive work environment to requiring strict compliance with fair lending practices to employing stringent data security and customer privacy measures. These are foundational building blocks of our company. Looking ahead, we intend to strengthen this foundation to address the issues that matter most to our stakeholders and increase our positive impact on society. We also believe that further integrating ESG activities throughout the company is critical for our long-term financial value creation.

While the customer is at the heart of everything we do, nothing would happen without our dedicated and passionate team of over 900 GLS employees. I am so proud of what they achieve every day and even more impressed by how they do it – with integrity, drive, determination, and compassion. They are the engine that will continue to drive our sustainability journey forward, continually raising the bar on what we can achieve together.

We look forward to sharing updates with you on our efforts and achievements in future annual ESG reports. Thank you to all of our stakeholders for your partnership and support.

Together, let's drive life forward.

About Global Lending Services

OUR PURPOSE

Accessing affordable credit to secure reliable transportation can be a game-changer for most people and their families. Nearly 1 in 3 consumers in the U.S. is credit-challenged, which makes getting a loan difficult and expensive.

GLS was founded in 2012 on the idea that advanced technologies could more accurately predict credit risk and eliminate human bias. This would enable GLS to provide more people with an affordable loan for the transportation they need.

GLS has developed an industry-leading 100% automated-decisioning model that provides loan decisions in under 15 seconds. We approve more loans than traditional banks and credit unions because our proprietary algorithm evaluates more than just a credit score. And with an innovative capital markets strategy, we continue to drive our cost of capital lower so we can offer lower rates to our customers.

Who we are

FOUNDED: 2012

OPERATIONS: 48 states

HEADQUARTERS: Greenville, South Carolina

OWNERSHIP: Privately held

NUMBER OF EMPLOYEES: 900+

GENDER DIVERSITY: 64% female / 36% male

ETHNIC/RACIAL DIVERSITY: 55% BIPOC ⁽¹⁾

TOTAL LOANS MADE TO DATE: \$8+ Billion

CUSTOMERS SERVED TO DATE: 400,000+

CURRENT ACTIVE CUSTOMERS: 236,000+

NUMBER OF DEALER PARTNERS: 12,500+

⁽¹⁾BIPOC refers to Black, Indigenous and People of Color

HOW WE OPERATE

At GLS, we are united in our vision and our mission. Our culture and our team's performance are driven by this shared understanding and every decision we make is guided by our values.

Our vision

We envision a world where everyone has access to affordable credit – a lifeline to everyday life.

Our mission

With our customers at the heart of all we do, we innovate through technology and advanced analytics to make transportation more accessible and affordable.

Together, let's drive life forward.

Our values

CARE DEEPLY | THINK BOLDLY



PROPRIETARY TECHNOLOGY IS A GAME-CHANGER

Simple, fast, transparent, fair

Our proprietary, seventh-generation decisioning engine is 100% automated, rendering decisions in seconds, while eliminating human bias. By harnessing the latest in advanced analytics, machine learning, alternative data, and over 10 years of performance data and 17 million credit applications, we have been able to build the industry's most advanced decisioning engine. By leveraging a combination of credit bureau, alternative data, collateral, and individual loan information, we are able to predict credit risk more accurately, thus enabling more customers to get access to financing at affordable rates.

OUR CUSTOMERS COME FIRST

Every decision we make is guided by one question: how will this impact our customers?

Since our founding, we have originated more than \$8 billion in automotive loans to more than 400,000 customers. We have built a vast network of partners through whom customers can access our loans. Those include more than 12,500 franchise dealers, OEM captives, bank and credit unions, and online auto purchasing platforms. We strive to ensure that our partners fully understand and appreciate how the GLS auto-decisioning tool works and how it benefits them as well as the customer.

Our work doesn't end with helping a customer get their auto loan application approved. We have over 800 team members dedicated to supporting our customers throughout the life of their loan. Whether it's to answer a question, take a payment, update contact information, help with a financial situation or whatever life brings, our agents are ready, trained, and available to assist.

Our ESG Strategy



At GLS, we envision a world where more people have access to affordable credit because everyone deserves mobility, especially those who may have experienced financial challenges in the past. An affordable auto loan creates opportunity, enhances quality of life and provides a means to re-establish good credit. We strive every day to create value for our customers, business partners, investors and employees, and operate with integrity, passion and determination.

We embrace our Environmental, Social and Governance (ESG) strategy as fundamental to how we operate. Purpose-led and guided by our values, GLS’s culture is one of integrity, excellence, respect and transparency. We are committed to operating with the highest ethical standards with all of our stakeholders – customers, business and capital partners, suppliers, community partners, investors and employees. We firmly believe that our ESG strategy is critical to enhancing the impact we have on our environment and communities, as well as to our long-term financial value creation.

GLOBAL LENDING SERVICES’ ESG PRINCIPLES



CORPORATE GOVERNANCE

We are dedicated to operating with integrity, sound governance, responsible business practices, and the highest standards of ethics to achieve business success and enhance long-term shareholder value.



OUR TEAM

We are committed to fostering an inclusive environment where every employee can be his/her authentic self and is supported to develop and grow both personally and professionally. We value, recognize and reward employees based on their contributions to each other, our customers, and our company.



SOCIAL IMPACT

Our business is built upon our vision of increasing access to affordable auto loans for the transportation people need for everyday life. We are also committed to supporting our local communities through philanthropy and volunteerism.



ENVIRONMENT

We strive to minimize the environmental impact of our operational footprint through energy efficient, eco-friendly, sustainable business practices.

ESG OVERSIGHT

We are committed to sustainable business practices and have implemented processes throughout our operations to ensure strong corporate governance, environmental stewardship and social responsibility. Our Board of Directors (Board) recognizes the importance of providing direct oversight of the ESG opportunities and challenges that impact our long-term business strategy, financial sustainability and shareholder value creation. Our Board works closely with the Executive Team to understand and provide guidance on the company’s ESG strategy and its execution.

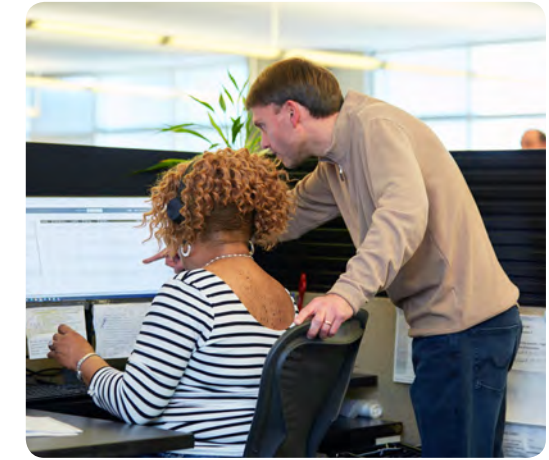
ABOUT THIS REPORT

This ESG Report has been prepared in accordance with the accounting standards published by the Sustainability Accounting Standards Board (SASB). We also have identified the United Nations Sustainable Development Goals (SDGs) that we believe best align our business activities and key priority areas. Both are included in the Appendix at the end of this report. Unless otherwise noted, data provided throughout this report covers our 2021 fiscal year, reflecting data for the period from January 1 through December 31, 2021.



Corporate Governance

GLS is committed to sound governance and high standards of ethical and responsible business conduct and compliance with applicable laws, rules, and regulations.



BOARD OVERSIGHT AND RISK MANAGEMENT

Our Board has primary responsibility for ensuring that our corporate governance and compliance measures adequately address applicable risks. Our Board meets quarterly to review business performance and discuss recent audit results, compliance trends, and data security initiatives. The Board has responsibility to review and approve the annual audit schedule and annual compliance training program.

Our Board has established a management advisory committee, the Enterprise Risk Committee (ERC), to provide day-to-day oversight of enterprise-level risks. In accordance with its charter, the ERC oversees the management of regulatory, reputational, and operational risks, including all compliance and vendor activities. The ERC also reviews all internal audit reports and remedial actions, customer complaint trends, and results from examinations by state and federal regulators.

Members of the ERC are appointed by the Board. These appointees include our CEO, Chief Financial Officer (CFO), Chief Analytics Officer (CAO), Chief Information Officer (CIO), Chief Operating Officer (COO), Chief Servicing Officer (CSO), and General Counsel. The ERC is chaired by our General Counsel, meets at least six times per year, and reports to the Board quarterly on corporate compliance and other risk matters.

BUSINESS ETHICS AND COMPLIANCE

GLS is committed to sound governance and high standards of ethical and responsible business conduct and compliance with applicable laws, rules, and regulations. We have established a Compliance Management System (CMS) as the framework for the critical elements of our compliance oversight, business practices and adherence regulatory requirements. The CMS establishes our compliance responsibilities, ensures they are communicated to employees, supports incorporation of responsibilities into business processes, monitors compliance with requirements, and tracks and reports corrective actions.

Compliance Program

The CMS is comprised of a series of sub-systems, each designed to establish a formal, structured method to track and ensure compliance with all applicable state and federal laws, rules, and regulations. The purpose of these systems is to prevent, or otherwise detect and correct, potential violations of laws, rules, and regulations related to GLS operations. The effectiveness of the CMS, as well as its underlying components, is managed by the Legal and Compliance Department (collectively, Compliance) and the ERC, with findings and developments being reported

to the Board. The ERC regularly reviews the status of our compliance with relevant laws, regulations, and internal policies and procedures. Compliance utilizes a consistent, risk-based approach and control framework, including independent compliance testing, in order to manage and mitigate compliance risk and to assess compliance with regulatory requirements governing our operations.

Compliance works with business operations and management to update business practices and policies to comply with new or modified laws and regulations. Company policies are reviewed and updated at least annually and include: Fair Lending; Fair Credit Reporting; Truth in Lending; Privacy; Unfair, Deceptive and Abusive Acts and Practices; and Vendor Management.

Whistleblower/Complaint Resolution Policy

We have established a Whistleblower/Complaint Resolution Policy that includes our confidential and anonymous reporting options designed to promote open communication of concerns of suspected fraudulent or dishonest business behavior, as well as provide reassurance that any individual making a report will be protected from harassment, retaliation, or adverse employment or other consequence for raising concerns regarding potentially inappropriate conduct.

Employee Training

Our training curriculum is built as an annual program with training delivered quarterly. The curriculum is customized at a department and role level on select topics that are most appropriate to individual roles. The training includes a series of courses around compliance and regulatory issues, as well as Human Resources (HR) best practices.

Annually, our General Counsel and SVP of HR will propose a required employee training agenda to the ERC for review and approval. Once approved by the ERC, the training schedule is presented to the Board for final approval. Training results are reported to the ERC and Board on a quarterly basis.

Upon hire and quarterly thereafter, all employees must participate in online training courses. Training courses are assigned quarterly and monitored for completion by Compliance. GLS leverages the American Financial Services Association (AFSA) University Learning Management System to source and deliver employee training content. Training is delivered through an online portal that tracks participation and includes a testing component with each training session to measure competency. Throughout 2021, 100% of our employees completed this required training and achieved a passing score on all competency testing.

Board training is conducted annually. Topics are selected based on current risks and recent industry concerns, such as ethics, motor vehicle lending, fair lending, information security, and more.

Compliance Monitoring and Audits

GLS leverages multiple approaches for compliance monitoring including an independent Quality Assurance (QA) program, a Compliance Automated Monitoring (Compliance Monitoring) function within Compliance, and an independent Internal Audit program.

Our QA assessments and Compliance Monitoring are completed on a monthly basis, and the results are reported to Operations Management, Executive Management and the ERC monthly, and to the Board quarterly. QA covers all operations areas, including originations and servicing activities such as loan reviews, customer service calls, collection calls, repossession activities, all customer legal notifications, and Credit Bureau reporting.

Internal Audit conducts in-depth audits across all GLS departments according to an annual audit plan that is approved by the ERC and the Board. The audit plan is developed based on an assessment of risk and controls within each department. Internal Audit results are reported to Executive Management and the ERC monthly, and the Board quarterly. Remediation plans are established based on audit results. Remediation status updates are reviewed monthly by the ERC, with any significant issues being escalated to the Board.

AMERICAN FINANCIAL SERVICES ASSOCIATION (AFSA)

GLS has multi-faceted participation with AFSA from serving on Board Committees to leveraging AFSA's learning management system for GLS's quarterly role-based compliance.

AFSA'S MISSION is to promote safe, ethical lending to responsible, informed borrowers and protect consumer access to credit.



DATA SECURITY AND CUSTOMER PRIVACY

We are dedicated to the security and integrity of the data we manage. Our privacy and security measures are designed to safeguard the sensitive data of our customers. We have strict oversight, policies, and controls to protect against anticipated threats to customer information and business operations.

Oversight

Our ERC has oversight responsibility for reviewing GLS's cybersecurity and other Information Technology (IT) risks, controls and procedures. An annual security plan is presented to and approved by the Board. Progress against the plan and results from ongoing security monitoring are presented quarterly to the Board. Reporting to the CEO, the CIO oversees our information security practices and programs, including cyber risk management, incident response planning, and data security training.

Employee Training

GLS's Information Security Awareness Policy (Information Security Policy) guides the execution of best practices for our data security training and protocols. All employees and consultants must complete the initial awareness orientation and refresher every year. Our technical and managerial employees are required to complete additional cybersecurity training to review security trends, technologies, and procedures. We also execute ongoing phishing and data security exercises periodically throughout the year to build employee awareness and identify and address areas of vulnerability in our daily business practices. During 2021, 100% of our employees completed the required IT training.

Security Protocols and Audits

Our Information Security Policy is universally applied across all business operations through multi-authentication systems, enterprise security tools, and firewall protocols. Our enterprise technology infrastructure has been strengthened through utilization of third-party, cloud-based platforms to provide ease of access while holistically ensuring data protection, resiliency, and redundancy. We have aligned with the Center for Internet Security (CIS) Top 18 Controls for our guidelines in implementing effective defense controls against cyber threats. We also regularly conduct data protection assessments, internal audits, and associated remediation activities.

Privacy Policy

Our Privacy Policy ensures compliance and security in the receipt and transmittal of customer information. This policy is intended to provide guidance on the handling of sensitive and personal information about consumers. Our policies and procedures facilitate employee access to sufficient information needed to perform job functions in a manner designed to prevent violations and to detect or prevent associated risks of harm to consumers.

Our employees (including temporary or contract staff) and vendors, in the course of their regular business, frequently receive and transmit sensitive personal information about consumers (Customer Information). We are committed to keeping Customer Information confidential in compliance with all applicable privacy laws and are also committed to safeguarding Customer Information from unauthorized disclosure and use. The standards in this policy represent minimum requirements based on applicable legal and regulatory guidance. They are intended to prevent GLS and its employees, temporary or contract staff, and vendors from engaging in any unlawful practices.

Security Incident Response Program

GLS's Security Incident Response Program (SIRP) serves to establish our approach to protecting the GLS network infrastructure and responding to malicious cyber events. The SIRP establishes detection, notification, preparedness, investigation and incident response protocols. IT Security has oversight of our technology preparedness with accountability extending across the IT Team. The Incident Response (IR) Lead works with our Core IR Team for security monitoring, vulnerability management and network security critical functions. The Extended IR Team assumes additional IR responsibilities in the areas of communications, legal support and customer service. The IR Lead also directs internal cybersecurity tabletop exercises at least annually and has engaged a third-party extended IR team to provide regular support for our IT training, audits and SIRP.

VENDOR MANAGEMENT

Vendor Management is critical to mitigating third-party risk through the entire vendor lifecycle. GLS's Vendor Management Policy ensures that both existing and new vendors and service providers comply with consumer financial laws that are applicable to our lines of business.

Vendor Oversight

Compliance is responsible for the ongoing management of GLS's Vendor Management Policy, from pre-contract evaluation through retirement of the vendor relationship. Compliance ensures the proper onboarding, maintenance, and contracting of all new and existing vendors and service providers. In addition, Compliance provides necessary reporting to all appropriate business owners, the ERC, Executive Team, Board, and appropriate examining bodies as requested and/or required. Compliance works closely with cross-functional teams from IT Security, Internal Audit and associated business owners to conduct vendor risk assessments, diligence and ongoing monitoring. Compliance has day-to-day oversight responsibilities of vendor lifecycle management. Results from vendor risk assessments and periodic reviews are presented to Executive Management monthly, and to the ERC and Board at each respective meeting.

GLS Third-Party Code of Conduct

GLS expects its suppliers, vendors, consultants, and other business partners (Third Party) to conduct their business according to the ethical standards of conduct as outlined within our GLS Third-Party Code of Conduct (Third-Party Code) and to comply with all applicable laws. Each GLS-approved Third Party is expected to read, understand, and acknowledge the Third-Party Code, which includes standards on compliance with laws, confidentiality, conflicts of interest, gifts, fair employment, health and safety, and asset protection.



Vendor Management Process

GLS's Vendor Management Policy outlines procedures and categories of oversight to ensure that both existing and new vendors and service providers comply with those federal consumer financial laws which are applicable to our lines of business. Highlights of key vendor due diligence processes and compliance oversight include the following:

STAGE IN VENDOR LIFECYCLE	STEPS IN VENDOR MANAGEMENT PROCESS
Pre-Contract Evaluation	<ul style="list-style-type: none"> Internal Vendor Risk Evaluations are conducted pre-contract to rate vendor risk based upon the criticality of the product/service to GLS, novelty of product/service to the market, vendor access to customer or other personally identifiable information (PII), and direct vendor engagement with our customers. Vendor Risk Ratings are then assigned after completion of the Internal Vendor Risk Evaluations to reflect the overall risk level of the impact to our business. Vendor Risk Assessments provide in-depth reviews across 14 different risk categories, including business continuity, customer privacy, physical security, compliance training, regulatory compliance, IT security controls, Office of Foreign Assets Control (OFAC) check, and financial condition.
Ongoing Vendor Management	<ul style="list-style-type: none"> Annual Reviews are conducted of high-risk vendors, and include updated Vendor Questionnaires, compliance reviews and site visits/assessments. The Contract Management System manages vendor agreements and provides ongoing contract management reporting. Cybersecurity Reviews provide ongoing data security assessments.

Dealer Management Policy and Procedures

Our dealer partnerships are managed separately from our vendor relationships. GLS maintains business and contractual relationships with automobile dealers to acquire retail installment sales contracts. We have a Dealer Risk Management Policy and associated procedures in place that are designed to manage dealer performance and dealer compliance risk, establish management oversight through the Dealer Risk Management Committee, and achieve fair and reasonable treatment of consumers. Under the policy, the Dealer Risk Management Accountable Executive oversees dealer risk management practices, including the creation of and adherence to operational and dealer monitoring procedures and preventative and detective controls.

BUSINESS CONTINUITY

We have developed a robust network of operations centers, vendors and technology platforms that provide us with 100% redundancy for all critical systems and function. This allows us to redirect work to available resources and overcome any business interruptions due to local conditions or system issues.

The ERC has oversight of our Business Continuity and Disaster Recovery Plan (BC/DR Plan), which outlines requirements for contingency and response plans and procedures to recover technical and/or business operations in situations where an unexpected event has caused an interruption of our employees' ability to perform their responsibilities. Our CIO and COO are responsible for maintaining specific parts of the full BC/CR Plan, including conducting annual tests and/or tabletop exercises, submitting the results to the ERC, and implementing corrective actions as needed.

Our Team

Our success depends on the people in our company, and we know that we can't achieve anything without them. It is important to us that we have a workplace where our team can thrive. For us, it is not enough to simply ask for results — we aim to cultivate success by ensuring we maintain a culture that is both driven to produce and focused on the highest quality service.



Our values

CARE DEEPLY | THINK BOLDLY

We are committed to improving the lives of our customers, our team members, and our communities. We hold ourselves to the highest ethical and moral standards in everything we do. We seek out innovative solutions, grounded in data and analytics, to create value for our customers. We operate as a team, support each other in our endeavors, and create an inclusive environment for all.

EMPLOYEE BENEFITS, WELL-BEING AND SAFETY

We take pride in offering an extensive benefits package that allows employees and their families to prepare for planned and unplanned life events.

Highlights of our benefits program can be found on our website Careers Page, including:

FINANCIAL BENEFITS	HEALTH CARE PLANS	LEAVE BENEFITS	WORK LIFE BALANCE	SOCIAL INITIATIVES
<ul style="list-style-type: none"> Competitive salaries with annual increases Various monthly and annual bonus incentive plans 401(k) plan with company matching contributions Tuition reimbursement program 	<ul style="list-style-type: none"> Medical insurance plans with the company covering up to 90% of the costs Comprehensive benefit options including dental, vision, life insurance and disability options Health savings account and flex spending 	<ul style="list-style-type: none"> Parental leave with bonding time up to eight weeks of paid time off (PTO) Family and medical leave Jury duty leave and military leave 	<ul style="list-style-type: none"> Up to 25 days per year of paid time off (PTO) 10 paid holidays, including a floating holiday Work-from-home options for certain job roles 	<ul style="list-style-type: none"> Volunteer opportunities in local community Annual PTO for employees to volunteer Company match on employee charitable contributions

We offer an Employee Assistance Program (EAP) through our insurance program to address personal issues, plan for life events, or simply manage daily life challenges that can affect work, health, and family. The EAP provides support, resources, and information for personal and work-life issues. It is company-sponsored, confidential, and provided at no charge.

Employee Safety

During the COVID-19 pandemic, we implemented remote and hybrid work options for most employees to promote employee health and safety. We transitioned over 90% of our workforce (approximately 800 employees) from offices to a work-from-home model. As of year-end 2021, approximately 60% of our employees worked from home 90%+ of the time, with over 90% of our employees working some form of hybrid work option.

We have Building Emergency Procedures in place to provide employees with shelter and evacuation protocols in the event of a fire, severe weather or other emergencies. We review and update these procedures annually, as well as facilitate annual employee drills at each office location.

EMPLOYEE ENGAGEMENT AND DEVELOPMENT

Employee Engagement

GLS conducts an annual Employee Engagement Survey to help identify areas of strengths and opportunities across our company. The information is shared with department heads, who analyze the employee feedback at a department level to determine Action Plans by area for the coming year. Each department tracks its progress against initiatives outlined in its Action Plans.

We also provide frequent communication with our employees to provide updates on these initiatives, goals and progress over the year through companywide meetings, emails and blogs. Our CEO sends out a monthly communication to all associates to review key accomplishments and company news items. HR provides a monthly update as well, highlighting key milestones, employee spotlights and benefit updates. Most of the departments also have monthly recognition programs and newsletters to feature top performers, educate on core department functions, and highlight external volunteer opportunities.

Training and Development

GLS has a robust training and development program supported by an internal team of professional trainers and curriculum developers. Approximately 80% of all new hires go through a formalized onboarding program, typically including classroom training, nesting, side-by-side and online training. The training is customized at a role level to ensure each employee has the necessary skills and information to be proficient in his or her new role.

GLS provides ongoing training to employees that is targeted at improving competencies or adding new skills that equip employees to be well-prepared in assuming new responsibilities or roles. For example, we offer quarterly leadership training through our GLS Leadership Academy covering people management topics, such as Behavioral Interviewing, Effective Coaching and Managing Within the Law. Employees are encouraged to work with their managers to write a development action plan on areas of focus for the year and to track their progress. Managers meet with each of their employees twice per year to provide performance feedback and discuss career path options. This review is intended to be a two-way dialog where employees can provide feedback and ask questions of their managers, as well. Through these discussions, managers identify development opportunities and position employees for career advancement.

GLS also supports our employees' educational pursuits through our Tuition Reimbursement Program. Eligible employees seeking a relevant college degree can qualify for tuition assistance. After six months of employment, all employees are eligible to receive up to \$4,000 in tuition reimbursement per year in their pursuit of an undergraduate or graduate degree program.

DIVERSITY, EQUITY AND INCLUSION

GLS is committed to an inclusive workplace that values, recognizes, and rewards employees based on their contributions to each other, our customers, and the company. We are committed to creating an environment where all people, regardless of background, can contribute, thrive, and succeed.

Diversity Awareness

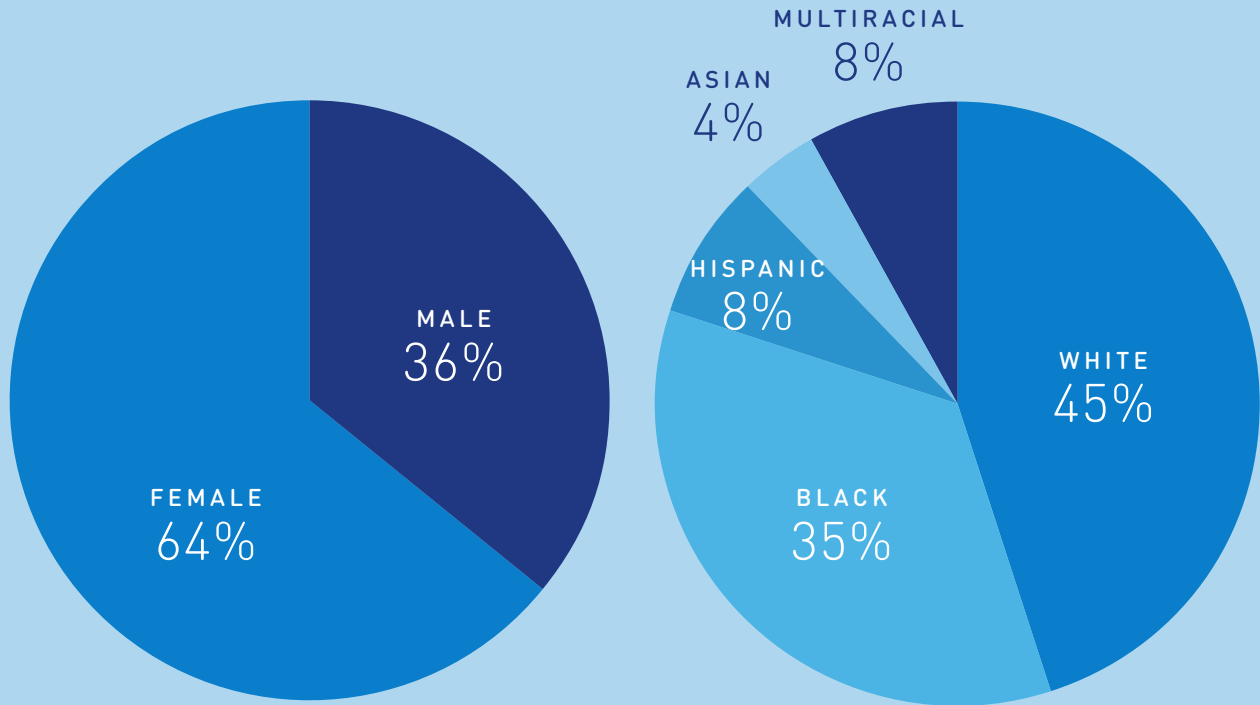
Our training curriculum includes courses on Diversity in the Workplace and Sexual Harassment, for which all employees receive refresher training annually. We hold ourselves accountable to HR policies covering Equal Opportunity, Diversity and Inclusion, Sexual Harassment and Unlawful Harassment.



Employee Diversity Metrics

Together, we aim to authentically demonstrate and model the principles of diversity and inclusion that enrich all communities. We are pleased with the progress we are achieving in expanding our efforts, while we still embrace striving toward our goals ahead.

GLS represents a very diverse workplace across gender and ethnicity. As of December 31, 2021, our employee population was 64% female and 36% male. Along ethnicity dimensions, 55% of our employees self-identified as BIPOC (non-white). Within our management levels, 54% were either Female or BIPOC (non-white).



Social Impact

ACCESS AND AFFORDABILITY

GLS was founded on the idea that technology and data science could be harnessed to predict credit losses more effectively and, in doing so, help more people get access to affordable transportation. By leveraging alternative data sources, well beyond the traditional credit bureau, we can assist customers often left behind by banks and prime lenders. We have also developed a diverse network of loan partners, which allows us to match customers with a more affordable cost of financing based on risk, driving down their overall cost of vehicle ownership. Since our beginning, GLS has helped over 400,000 individuals and families gain access to affordable transportation when banks and prime lenders were unable to do so. Many of these customers are new to credit or had previous life events that hurt their credit scores and are trying to get back on their feet. Through GLS's propriety models and alternative data, GLS is able to approve over 70% of all applicants, providing them an opportunity to purchase affordable transportation.

We pride ourselves on our unique, customer-centric approach in facilitating a positive experience through our core practices:

100% Unbiased Automated Decisions	Our underwriting process is driven by automated credit models that determine the approval decision as well as the pricing and terms of the loan based upon the applicant's credit history. Our proprietary automated approach removes human discretion from the credit decisioning and instead leverages data and technology to analyze customer loan applications and facilitate 100% unbiased automated decisions.
Affordable Credit	At the heart of our mission is empowering people with affordable transportation by providing them with better financing options through our integrated approach of advanced technology and data science. Our analytical approach and unique business model allow us to offer competitive, lower interest rates to our borrowing customers. Our risk assessment approach is designed to provide customers with an affordable credit option that successfully positions them on the path to vehicle ownership.
Payment Affordability	As part of our lending process, we work with customers to ensure they can afford their new car payment. We have a risk-based approach to verifying income and employment to ensure customers are well positioned to be able to support their new monthly payment. In most cases, we will also integrate a customer interview within the loan origination process to ensure ethical and transparent lending practices are followed.
Ongoing Support	We recognize that a portion of our customer base may encounter financial hardships that may impede their ability to remain in compliance with the terms of the loan agreements. We therefore aim to work closely with our customers through our Customer Servicing team to provide payment alternatives that will help customers get back on track.
Financial Literacy	Improving education and financial literacy is a key component of our mission. GLS offers all customers and employees the opportunity to access free financial literacy programs through our website. We also offer financial literacy webinars to our employees through our benefits providers. In addition, GLS partners with local colleges to offer financial literacy seminars for students. We find this to be a great pathway toward helping students garner the skills to manage their credit as they begin to enter the workforce.

FAIR SELLING PRACTICES

Our daily lending practices are firmly grounded on our basic and fundamental commitment to conduct all activities in compliance with all applicable laws, rules, regulations, regulatory guidance, and internal policies. Our approach has been designed to align with laws such as the Equal Credit Opportunity Act (ECOA). A core tenant of this commitment is our adherence to the principles of fair lending and servicing – the fair, equitable, and nondiscriminatory access to credit for consumers and account servicing for customers.

We are committed to treating all individuals in a fair and equitable manner. We maintain the following fair lending and servicing standards in all jurisdictions where we conduct business:



Consumer Complaint Management

Consumer complaints play a key role in detecting policy or processing issues that may be impacting our customers. Our Complaints Management Process was developed to ensure that complaints are handled promptly and that we effectively identify and reach reasonable resolutions. We intake complaints, inquiries, and disputes through a variety of channels, including the Consumer Financial Protection Bureau Portal, Better Business Bureau, State Attorneys General's Offices, State Departments of Justice, direct written consumer correspondence, and verbal interactions.

As an integral part of GLS's Compliance Management System, the Board and ERC have responsibility for ensuring that the Complaints Management Process is designed and managed effectively. Complaints are reported to Executive Management monthly and to the ERC and the Board at their respective meetings. Consumer complaints and remediation items are administered and tracked by Compliance. Monthly reports are then provided by Compliance to the Executive Team that detail trends, identify root causes, and suggest improvements and policy changes, if applicable.

PHILANTHROPY AND VOLUNTEERISM

Our GLS Team is committed to supporting our local communities to assist those in need. We also have a long history of supporting those in need after being impacted by natural disaster.

As part of our commitment, we support nonprofit organizations through financial contributions, employee-led supply drives and employee volunteerism. Through our volunteerism initiative, we provide our employees with PTO to volunteer and support their preferred nonprofit causes.

Our social impact efforts are primarily focused in three areas:

- Supporting organizations that improve the lives of children and families
- Helping to improve education and financial literacy
- Aiding those impacted by natural disasters

Some of our efforts include:



CORPORATE FINANCIAL DONATIONS

GLS has improved the lives of others through direct financial donations to many charities that align with our philanthropy mission. GLS has long-standing relationships with local food banks, Boys & Girls Clubs, Ronald McDonald House, Little Steps, Pendleton Place and Arizona Children's Charities.



EMPLOYEE FINANCIAL DONATIONS

GLS partners with United Way to enable employees to make financial donations to United Way or their preferred nonprofits through payroll deductions. In addition to supporting employee contributions, GLS provides a 50% match on all employee donations through the United Way partnership to increase the impact we can make on our local nonprofits.



EMPLOYEE DONATION DRIVES

Our teams play a huge part in assisting our communities by providing much-needed supplies to various local charities. Teams lead employee-initiated donation drives to support local food banks, back-to-school initiatives, Toys for Tots, and other local nonprofit organizations.



DISASTER RELIEF

Our support extends beyond our local communities to those living in areas impacted by natural disasters. Our sales representatives across the country partner with business owners to provide supplies and relief to those impacted by these circumstances.

Employee Giving

Our employees believe in the power of connecting with the communities where we live and work. They dedicate their time, energy, and passion to make a difference in the lives of others. We share our employees' passion for giving back by encouraging volunteerism and providing matching programs for their personal philanthropy. We also provide all our employees a half day (four hours) of PTO so they can engage meaningfully in charity during working hours.



We strive to minimize the environmental impact of our operational footprint through sustainable business practices. We lease our office space, including our headquarters in Greenville, South Carolina, and our offices in Tempe, Arizona, allowing us to rightsize our operational footprint.

We also provide a flexible workforce environment with over 90% of our employees working in a hybrid work environment, splitting time between working from home or in the office. Over 70% of our employees only come in the office two days per month. Our flexible work options lower our overall operational environmental impact through reduced office space needs and fewer employee commutes.

We also outsource our data center to large-scale industry providers thus decreasing our overall carbon footprint by leveraging the economies-of-scale and environmental efficiencies of our third-party or system vendor’s cloud-based data center capabilities.

While the majority of the building decisions are controlled by property management, we integrate eco-friendly business practices where possible, such as:

- **Energy conservation with motion-sensor lighting;**
- **Waste diversion with recycling options in our breakrooms and a paper shredding/recycling program; and**
- **Water conservation with automatic water efficiency features.**

We also have implemented paperless operational processes throughout all departments, significantly reducing paper requirements within our offices. Over 90% of employees perform their job without any need for printing or paper handling.

In addition, we offer all our customers full e-contract options to eliminate the need for paper and shipping. Customers also can make all their payments electronically, online or through our automated interactive voice system with their debit card or banking information, eliminating the need to mail in a payment.



HELPING THE ENVIRONMENT THROUGH E-CONTRACTING:
 The vehicle finance industry has been increasingly using e-contracts instead of paper in a move toward a more digitally focused lending infrastructure with improved accuracy and timeliness. The digital buying process leads to lower paper usage.

UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (SDGs)

The United Nations SDGs are a collaborative, global effort to achieve a better and more sustainable future for all. Represented by 17 Global Goals and 169 targets, the SDGs address challenges of poverty, inequality, climate change, environmental degradation, peace, and justice. We identified the key areas where we have the greatest influence and impact through our business strategy, products, and services.

SDG	COMMENTS	DESCRIPTION	REPORT SECTION
5 GENDER EQUALITY	Achieve gender equality and empower all women and girls	GLS is committed to an inclusive workplace that values, recognizes, and rewards employees based on their contributions to each other, our customers, and the company. We promote an environment where all people, regardless of gender or ethnicity, can contribute, thrive, and succeed.	Our Team
8 DECENT WORK AND ECONOMIC GROWTH	Promote inclusive and sustainable economic growth, employment and decent work for all	GLS provides affordable auto loans that create opportunity and mobility for our customers. Access to affordable transportation supports the economic well-being of individuals, families, and communities.	Social Impact
10 REDUCED INEQUALITIES	Reduce inequality within and among countries	GLS is committed to the principles of fair lending – the fair, equitable, and nondiscriminatory access to credit for consumers. We leverage and integrate advanced technologies that more accurately predict credit risk while also eliminating human bias. This unique approach enables us to provide more people with affordable access to credit and greater opportunity to improve their lives.	Social Impact
11 SUSTAINABLE CITIES AND COMMUNITIES	Make cities and human settlements inclusive, safe, resilient and sustainable	Our GLS Team actively supports local communities and assists those in need. As part of our community commitments, we support nonprofit organizations through financial contributions, employee-led supply drives and employee volunteerism.	Philanthropy and Volunteerism

SUSTAINABILITY ACCOUNTING STANDARDS BOARD (SASB)

The below table incorporates accounting standards from the Sustainability Accounting Standards Board (SASB) related to Consumer Finance (FN-CF), as well as relevant topics within Commercial Banks (FN-CB) and Asset Management and Custody Activities (FN-AC). It includes references to sections within this report where specific topics are discussed.

TOPIC	ACCOUNTING METRIC	SASB CODE	2021 RESPONSE
Customer Privacy	Number of account holders whose information is used for secondary purposes	FN-CF-220a.1	Account holder information is not used for secondary purposes.
	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	FN-CF-220a.2	We had no material monetary losses of this kind during 2021. See Data Security and Customer Privacy section of this report for more information.
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	FN-CF-230a.1	We had no material breaches involving PII in 2021.
	Card-related fraud losses from (1) card-not present fraud and (2) card-present and other fraud	FN-CF-230a.2	Not applicable to our business model.
	Description of approach to identifying and addressing data security risks	FN-CF-230a.3	See Data Security and Customer Privacy section of this report.
Selling Practices	Percentage of total remuneration for covered employees that is variable and linked to the amount of products and services sold	FN-CF-270a.1	We do not publicly disclose this information.
	Approval rate for (1) credit and (2) pre-paid products for applicants with FICO scores above and below 660	FN-CF-270a.2	(1) We do not disclose approval rates by FICO band but approve more loans than traditional banks and credit unions (see About Global Lending Services and Access and Affordability sections in this report.) (2) Not applicable to our business model.

TOPIC	ACCOUNTING METRIC	SASB CODE	2021 RESPONSE
Selling Practices (continued)	(1) Average fees from add-on products, (2) average APR, (3) average age of accounts, (4) average number of trade lines, and (5) average annual fees for pre-paid products for customers with FICO scores above and below 660	FN-CF-270a.3	(1) We do not sell or charge fees for add-on products. (2) – (4) We do not disclose this information. (5) We do not sell or charge fees for pre-paid products. See Access and Affordability section of this report for more information.
	(1) Number of complaints filed with the Consumer Financial Protection Bureau (CFPB), (2) percentage with monetary or nonmonetary relief, (3) percentage disputed by consumer, (4) percentage that resulted in investigation by the CFPB	FN-CF-270a.4	We do not publicly disclose this information. However, this information is disclosed publicly on the Consumer Financial Protection Bureau website. https://consumerfinance.gov
	Total amount of monetary losses as a result of legal proceedings associated with selling and servicing of products	FN-CF-270a.5	We had no material monetary losses of this kind during 2021. See Fair Selling Practices section of this report for more information.
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	FN-CB-510a.1	We had no monetary losses of this kind in 2021. See Business Ethics and Compliance section of this report for more information.
	Description of whistleblower policies and procedures	FN-CB-510a.2	See Business Ethics and Compliance section of this report for information on our Whistleblower/Complaint Resolution Policy.
Employee Diversity and Inclusion	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	FN-AC-330a.1	As of December 31, 2021, our employee population was 64% female and 36% male, and 55% of our employees self-identified as BIPOC (non-white). Within our management levels, 54% was either female or BIPOC (non-white). See Diversity, Equity and Inclusion section of this report for more information.

